As the Executive Vice President for the Home Builders Association of Kitsap County, WA and affiliated with the Building Industry Association of Washington and the National Association of Home Builders, I am very concerned about your latest ruling about fax transmissions to member companies.

As part of an affiliated membership non-profit trade association it is unclear whether the National, State and Local all have to acquire written permission to receive faxes. While well intentioned, this is onerous and totally unnecessary. We occasionally send fax broadcasts (from office computers) to those members who have provided us with a fax number - these faxes inform members about upcoming event, activities and government issues. To require my association to receive written authorization will be very time consuming and difficult to track - shy of creating an entire new database modification. We have published members fax numbers (along with phones, addresses, emails and websites) in our printed membership directory and on our websie for years. Any member who requests that we not fax them (or email them) - we remove that data from our membership database which is the source for both print and website information - and we no longer fax to them. In 15 years in association management with Home Builders Associations I have never had one request not to fax to a member company. Regardless, if a member company is not satisfied with our association they will simply not renew their membership - automatically eliminating themselves from our roster.

Member companies join our association in large part for information, events and activities. This proposed rule will serious hamper our efforts as a small local trade association to serve our members. At some point our members will become dissatified with us - but not for faxing them information BUT for not doing what they would like us to do - BECAUSE WE ARE SPENDING SO MUCH OF OUR TIME AND RESOURCES MEETING WELL INTENTIONED BUT STUPID REGULATIONS!

Art Castle, BIAE Executive Vice President Home Builders Association of Kitsap County, WA